

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

|                                 |   |                            |
|---------------------------------|---|----------------------------|
| In Re:                          | ) | Chapter 11                 |
|                                 | ) |                            |
| LEGACY IMBDS, INC., et al.,     | ) | Case No. 23-10852-KBO      |
|                                 | ) |                            |
| Debtors.                        | ) | Jointly Administered       |
|                                 | ) |                            |
|                                 | ) |                            |
| SYNACOR, INC.,                  | ) |                            |
|                                 | ) |                            |
| Plaintiff,                      | ) |                            |
|                                 | ) |                            |
| v.                              | ) |                            |
|                                 | ) |                            |
| IV MEDIA, LLC; INNOVATION       | ) | Adversary No. 23-50753-KBO |
| VENTURS, LLC; PORTAL            | ) |                            |
| ACQUISITION CO.; IMEDIA BRANDS, | ) |                            |
| INC.; VALUEVISION INTERACTIVE,  | ) |                            |
| INC.; VVI FULFILLMENT CENTER,   | ) |                            |
| INC.; VALUEVISION RETAIL, INC.; | ) |                            |
| JWH ACQUISITION COMPANY; PW     | ) |                            |
| ACQUISITION COMPANY, LLC; EP    | ) |                            |
| PROPERTIES, LLC; FL ACQUISITION | ) |                            |
| COMPANY; NORWELL TELEVISION,    | ) |                            |
| LLC; 867 GRAND AVENUE, LLC;     | ) |                            |
| UNIDENTIFIED PARTIES 1-25,      | ) |                            |
|                                 | ) |                            |
| Defendants.                     | ) |                            |

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned counsel hereby enter their appearance in the above captioned case as counsel to the Plaintiff, pursuant to section 1109(b) of title 11 of the United States Code and rules 2002, 3017, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rule 2002-1(d) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and request that

copies of any and all notices, papers, and pleadings, filed or entered in this case be given to and served upon Plaintiff through their undersigned counsel as follows:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, all orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of financial affairs, operating reports, plans of reorganization and disclosure statements, whether formal or informal, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this *Notice of Appearance and Request for Service of Papers* nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed or construed to constitute a waiver of any substantive or procedural rights of Plaintiff, including, without limitation,: (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “District Court”), (ii) the right to trial by jury in any proceeding related to these cases or any case,

controversy or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent the consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court, or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which Petitioners are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until Plaintiff expressly states otherwise, Plaintiff does not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: November 13, 2023  
Wilmington, Delaware

/s/ Christopher Viceconte  
Christopher Viceconte (No. 5568)  
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*Counsel for Plaintiff Synacor Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on this 13<sup>th</sup> day of November 2023, a true and correct copy of the foregoing *Notice of Appearance and Request for Service of Papers* was caused to be served via CM/ECF on all parties who have registered for electronic service in this case.

Dated: November 13, 2023  
Wilmington, Delaware

/s/ Christopher Viceconte  
Christopher Viceconte (No. 5568)  
Gibbons, P.C.